

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION**

**LAL BHATIA, #97562-011**

**PETITIONER/PLAINTIFF**

**V.**

**CIVIL ACTION NO. 5:16CV00011-KS-MTP**

**UNITED STATES OF AMERICAN;  
IMMIGRATION AND CUSTOMS ENFORCEMENT;  
JEH CHARLES JOHNSON, Secretary of the Department  
of Homeland Security; SARAH R. SALDANA, Director of  
Immigration and Customs Enforcement; DAVID RIVERA,  
Field Office Director for the New Orleans  
Field Office of ICE**

**RESPONDENTS/DEFENDANTS**

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendants respectfully move the Court for an extension of time to file its answer or other responsive pleading in this matter. Defendants' responsive pleading is presently due May 2, 2016; however, agency counsel has been out of the office on military duty until today. Defendants respectfully request that the Court allow an additional fourteen (14) days for Defendants to file their responsive pleading. The extension of time is necessary to allow sufficient time to appropriately respond to Plaintiff's claims. Defendants therefore respectfully request that the Court allow them until May 16, 2016, to file their responsive pleading to the Plaintiff's Complaint.

This the 2<sup>nd</sup> day of May, 2016.

Respectfully submitted,

GREGORY K. DAVIS  
UNITED STATES ATTORNEY

By: /s/Angela Givens Williams  
ANGELA GIVENS WILLIAMS

Assistant U.S. Attorney  
501 E. Court St., Ste. 4.430  
Jackson, Mississippi 39201  
Telephone No.: 601/965-4480  
Facsimile No.: 601/965-4409  
MS Bar Number 102469  
E-mail: [angela.williams3@usdoj.gov](mailto:angela.williams3@usdoj.gov)

**CERTIFICATE OF SERVICE**

I, ANGELA GIVENS WILLIAMS, Assistant United States Attorney, hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the ECF system and mailed a copy of the same to:

Lal Bhatia  
Reg. No. 97562-011  
LaSalle Detention Center  
Post Office Box 560  
Trout, LA 71371

This the 2<sup>nd</sup> day of May, 2016.

/s/Angela Givens Williams  
ANGELA GIVENS WILLIAMS  
Assistant U.S. Attorney